



**Stephen E. Coran**  
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April 5, 2007

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**FILED/ACCEPTED**

**APR - 5 2007**

Federal Communications Commission  
Office of the Secretary

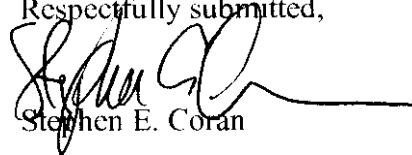
**Re: Polar Communications  
2.5 GHz Transition Initiation Plan  
Grand Forks Basic Trading Area (BTA #166)  
WT Docket No. 06-136**

Dear Ms. Dortch:

Transmitted herewith on behalf of Polar Communications ("Polar"), pursuant to Section 27.1231(f) of the Commission's Rules, is Polar's Initiation Plan to transition certain Broadband Radio Service and Educational Broadband Service licenses in the Grand Forks Basic Trading Area (BTA # 166). As the holder of the Grand Forks BTA authorization, Polar satisfies the eligibility criteria of Section 27.1231(c)(1) and has satisfied all necessary conditions for filing an Initiation Plan.

Please contact undersigned counsel if there are any questions concerning this Initiation Plan.

Respectfully submitted,



Stephen E. Coran

Enclosure

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List A B C D E

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April 5, 2007

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: **2.5 GHz Transition Initiation Plan for  
Grand Forks Basic Trading Area (BTA #166)  
WT Docket No. 06-136**

Dear Ms. Dortch:

Pursuant to Section 27.1231(f) of the Commission's rules, Polar Communications ("Polar") hereby respectfully submits this Initiation Plan to transition certain Broadband Radio Service ("BRS") and Educational Broadband Service ("EBS") licenses in the Grand Forks Basic Trading Area (BTA #166). As the holder of the Grand Forks BTA authorization, Polar satisfies the eligibility criteria of Section 27.1231(c)(1) and **has** satisfied all necessary conditions for filing an Initiation Plan.

The following information is being provided pursuant to Section 27.1231(f):

1. *List of BTAs:* The BTA being transitioned is the Grand Forks BTA (BTA166). In a separate Request for Waiver, United Telephone Mutual Aid Corporation, on behalf of itself and BRS and EBS licensees with Geographic Service Area center points collocated at Milton and Egeland, North Dakota, are seeking waiver of the transition rules. Polar supports grant of the requested waiver.
2. *List of Transitioning Licensees:* A list by call sign of the BRS and EBS licensees in the BTA that are **being** transitioned is provided in Exhibit A
3. *"Best estimate" of completion of the transition:* After Nly evaluating the number and type of licenses being transitioned, Polar's best estimate for completing the transition is April 1, 2008.
4. *Statement on Adjacent BTAs:* Licensees in adjoining or adjacent BTA(s) need not be transitioned to avoid interference in the Grand Forks BTA being transitioned. There will be no harmful interference to the transitioned licensees from existing operations outside the BTA. However, if measurements indicate interference from operations outside the BTA, Polar will incorporate the interfering licensee(s) into this transition or will initiate transition for the BTA of the interfering licensee(s).

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5. *Statement on Co-Proponent:* Polar is not transitioning ~~this~~ market jointly with a co-proponent.
6. *Statement on Funds.* Polar Communications certifies that it ~~has~~ the funds available to pay the reasonable expected costs ~~of~~ the transition.

Please direct **any** questions to Shari Flanders at (701) 284-7221 ext. **343** or [sflanders@polar.net](mailto:sflanders@polar.net), or to Stephen E. Coran, counsel to Polar, at (202) **463-4310** or [scoran@rinicoran.com](mailto:scoran@rinicoran.com).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Dunning".

David Dunning  
General Manager/CEO

Attachment

cc: Joel Taubenblatt,  
John Schauble  
Nancy Zaczek

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## Exhibit A

Polar Communications is transitioning the Grand Forks BTA. Except as set forth separately below, the EBS and BRS licensees that are being transitioned are as follows:

### *EBS/BRS Licensees Being Transitioned*

Call Sign	Licensee
WNC443	Larimore Public School Dist #44
WNC444	Northwood Public School Dist #129
WLW888	Polar Communications
BTA166	Polar Communications

### *EBS/BRS Licensees Subject to Waiver Request to Opt Out of Transition*

Call Sign	Licensee
WNC551	Cavalier Public School District #6
WLW985	Cavalier Rural Electric Cooperative
WNEZ907	Cavalier Rural Electric Cooperative
WLW982	Cavalier Rural Electric Cooperative
WNTA471	Cavalier Rural Electric Cooperative
WNC553	Grafton Public School District #3
WNC550	Park River Public School District #78
WMX661	United Telephone Mutual Aid Corporation
WLW984	United Telephone Mutual Aid Corporation
WMX662	United Telephone Mutual Aid Corporation
WNEZ913	United Telephone Mutual Aid Corporation
WNJC633	United Telephone Mutual Aid Corporation
WMY447	United Telephone Mutual Aid Corporation
WMX715	United Telephone Mutual Aid Corporation
WMX714	United Telephone Mutual Aid Corporation
WLW986	United Telephone Mutual Aid Corporation
WNTA554	United Telephone Mutual Aid Corporation
WNTC634	United Telephone Mutual Aid Corporation
WMY208	United Telephone Mutual Aid Corporation

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Federal Communications Commission  
Office of the Secretary

EX PARTE

April 3, 2007

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Koom TW-A325  
Washington, DC 20554

*Re: Section 272(f)(1) Sunset of the BOC Separate Affiliate and  
Related Requirements, WC Docket No. 02-112*

Dear Ms. Dortch:

At a meeting with Verizon on March 29, 2007, Wireline Competition Bureau Staff asked several questions about the data provided in Verizon's March 27 Response.<sup>1</sup> The attached exhibits and information below respond to staffs questions.

Exhibit 1.A.1.a contains the same data Verizon submitted on March 27, 2007 as the worksheet labeled "VZ Residential Retail" in Exhibit 1.A.1 (legacy Verizon residential retail lines), however, Exhibit 1.A.1.a disaggregates volumes in Pennsylvania and Virginia by areas served by the former Bell Atlantic and the former GTE. The remaining worksheets submitted in Exhibit 1.A.1 of Verizon's March 27 Response show residential retail lines that are presubscribed to Verizon Long Distance: these worksheets represent legacy Verizon retail lines only and do not include those lines served by the former MCI. Verizon does not have data to disaggregate these volumes by areas served by the former Bell Atlantic and the former GTE in Pennsylvania and Virginia.

<sup>1</sup> Response of Verizon to the Commission's March 13, 2007 Information Request ("Verizon's March 21 Response"), attached to Letter from Joseph Jackson, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112 (Mar. 21, 2007).

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Exhibit 1.A.2.a contains the same data that Verizon submitted as Exhibit 1.A.2, for Pennsylvania and Virginia (legacy Verizon residential retail lines for which Verizon Long Distance is not the PIC), however, Exhibit 1.A.2.a disaggregates volumes by areas served by the former Bell Atlantic and the former GTE.

Exhibit 1.A.3.a contains the same data that Verizon submitted as Exhibit 1.A.3, for Pennsylvania and Virginia (legacy Verizon residential retail lines for which no PIC is identified), however, Exhibit 1.A.3.a disaggregates volumes by areas served by the former Bell Atlantic and the former GTE.

Exhibit 2.A contains the same data that Verizon submitted as Exhibit 2, for Pennsylvania (wholesale residential lines that are presubscribed to Verizon Long Distance), however, Exhibit 2.A disaggregates volumes by areas served by the former Bell Atlantic and the former GTE. Data for Virginia are not available.

Exhibit 1.H is the December 2005 Yankee Group report<sup>2</sup> that Verizon cited in response to Specification 1.h (at footnote 19), and in Verizon's February 15, 2007 ex parte.<sup>3</sup> The Yankee Group found that wireless subscribers make 64 percent of their long-distance calls and 42 percent of their local calls on their wireless phones.<sup>4</sup>

Wireline Competition Bureau Staff also requested clarification of certain data. With respect to the residential E911 listings data provided in Exhibit 1.F.1 for Idaho, **[BEGIN HIGHLY CONFIDENTIAL]**

**[END HIGHLY CONFIDENTIAL]**. Verizon is gathering data that address the remaining issues, and will submit them to the Commission as they become available.

Exhibits 1.A.3.a and 1.H contain Confidential Information and have been marked "CONFIDENTIAL – SUBJECT TO FIRST PROTECTIVE ORDER in accordance with the First Protective Order in this proceeding."<sup>5</sup> Exhibits 1.A.1.a, 1.A.2.a, and 2.A contain Highly Confidential Information and have been marked "HIGHLY CONFIDENTIAL INFORMATION - SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 02-112 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION" in accordance with the Second Protective Order in this proceeding?

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<sup>2</sup> K. Griffin, Yankee Group, *Pervasive Substitution Precedes Displacement and Fixed-Mobile Convergence in Latest Wireless Trends* (Dec. 2005) ("*December 2005 Yankee Group Report*").

<sup>3</sup> Letter from Dee May, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112, at 8 fn.47 (Feb. 15, 2007).

<sup>4</sup> *December 2005 Yankee Group Report* at 5 and Exhibit 3 (attached as Exhibit 1.H).

<sup>5</sup> *Section 272(f)(1) Sunset of the ROC Separate Affiliate and Related Requirements*, First Protective Order, WC Docket No. 02-112, DA 07-1387 (rel. Mar. 23, 2007).

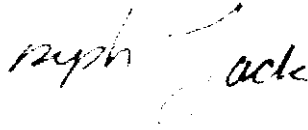
<sup>6</sup> *Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related Requirements*, Second Protective Order, WC Docket No. 02-112, DA 07-1389 (rel. Mar. 23, 2007).

April 3, 2007

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If you have any **questions, please** call me at 202-515-2467.

Very truly yours:

A handwritten signature in black ink, appearing to read "Ralph Jack". The signature is written in a cursive, slightly slanted style.

Enclosures

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